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Attorneys for Defendant  
MAYTAG CORPORATION

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

STATE FARM GENERAL INSURANCE )  
CO., )  
Plaintiff, )  
vs. )  
MAYTAG CORPORATION, and DOES 1 )  
through 20 )  
Defendants. )

**No. 2:05-CV-00655-WBS-DAD**

**STIPULATED REQUEST TO MODIFY  
THE SCHEDULING ORDER  
AND [PROPOSED] ORDER**

Plaintiff State Farm General Insurance Co. ("State Farm") and Defendant Maytag Corporation ("Maytag") hereby make this stipulated request for an order to modify the scheduling order pursuant to Local Rules 83-143 and 6-144.

On January 30, 2006, the parties filed a Stipulated Request to Modify The Scheduling Order and Request to Withdraw January 18, 2006 Stipulation to continue certain deadlines from the August 4, 2005 Scheduling Order because of difficulties in scheduling the depositions of the

insureds in this matter due to an illness in the insured's family and also to allow the experts to arrange for and conduct a more detailed examination of the subject machines in a laboratory facility. On February 1, 2006, the Court granted the Stipulated Request which provided for the following deadlines:

<b>Disclosure of Expert Witnesses</b>	<b>March 15, 2006</b>
<b>Disclosure of Rebuttal Expert Witness</b>	<b>April 17, 2006</b>
<b>Close of Discovery</b>	<b>June 16, 2006</b>
<b>All Discovery Motions Heard</b>	<b>June 16, 2006</b>
<b>Last Day for Filing Motions</b>	<b>July 21, 2006</b>
<b>Final Pretrial Conference</b>	<b>October 23, 2006 at 10 a.m.</b>
<b>Trial Date</b>	<b>December 12, 2006 at 9 a.m.</b>

Since the Court modified the scheduling order on February 1, 2006, the parties have continued to diligently pursue written and oral discovery, including the additional expert examination of the subject machines at issue in this case which took place on February 21, 2006. In addition, the parties had scheduled the depositions of the insured's to take place on March 6, 2006. However, prior to the depositions, the parties began to engage in settlement discussions that the parties hope will resolve this case. The parties now seek to modify the current scheduling order again so the parties can continue to engage in settlement negotiations without incurring additional expenses and fees spent on depositions and expert reports. The parties are hopeful that a settlement can be reached within the next two weeks, and the parties will continue with the depositions and the expert reports if it appears no resolution is forthcoming. Therefore, the parties respectfully propose the following modifications to the Scheduling Order:

<b>Disclosure of Expert Witnesses</b>	<b>April 14, 2006</b>
<b>Disclosure of Rebuttal Expert Witness</b>	<b>May 15, 2006</b>

The parties do not propose any modifications to the other deadlines set forth in the February 1, 2006 Scheduling Order and do not seek to modify the deadline for close of discovery or the trial date.

1 This is the second extension of time sought by the parties. The parties' stipulated request to  
2 modify the Scheduling Order is not sought for the purpose delay but is intended to allow the parties  
3 to engage in meaningful settlement discussion without incurring additional expenses and fees spent  
4 on depositions and expert reports.

5  
6 Respectfully Submitted,

7 Dated: March 6, 2006

HUBERT & YASUTAKE

8  
9 \_\_\_\_\_  
/s/

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13 Attorneys for Plaintiff  
14 STATE FARM GENERAL INSURANCE CO.

15 Dated: March 6, 2006

HOLLAND & KNIGHT LLP

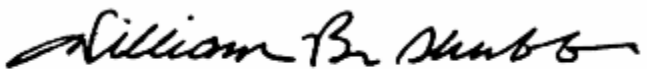
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17 \_\_\_\_\_  
/s/

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22 Attorneys for Defendant  
23 MAYTAG CORPORATION

24 **IT IS SO ORDERED.**

25 Dated: March 7, 2006

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27 WILLIAM B. SHUBB  
28 UNITED STATES DISTRICT JUDGE

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